

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION**

RITACCA COSMETIC SURGERY AND MED SPA, LTD., <i>et al.</i> ,	)	
	)	
	)	Case No. 3:15-cv-50148
Plaintiffs,	)	
	)	Judge Frederick J. Kapala
v.	)	
	)	Magistrate Judge Iain D. Johnston
CYNOSURE, INC.,	)	
	)	
Defendant.	)	

**JOINT STATUS REPORT**

Pursuant to the parties' Short-Term Discovery Plan ("Discovery Plan") (Doc. # 202), and this Court's order approving the same (Doc # 203), Plaintiff and Defendant jointly submit this status report.

In accordance with the Discovery Plan, the parties exchanged lists of witnesses – including individual witnesses and draft 30(b)(6) notices – and conferred about the deposition requests and 30(b)(6) topics. The parties were successful in working through these issues, and at this time, have no disputes warranting Court involvement.

Defendant Cynosure has agreed to produce two individual witnesses and is making outreach to two former employees whose depositions were requested to try to secure their voluntary attendance at deposition. Cynosure further will produce witness(es) to cover approximately 25 topics contained in Plaintiff's 30(b)(6) notice. Certain other requested witnesses are former employees not within Cynosure's control, and Plaintiff will pursue those depositions directly as necessary.

Plaintiff will produce two individual witnesses, Dr. Ritacca and another individual affiliated with his practice. Those witnesses will also cover approximately 11 topics contained in Defendant's 30(b)(6) notice.

The parties are working on deposition dates, and expect deposition discovery to begin in earnest in October. We will be prepared to provide the Court with a further update on scheduling during the September 18 telephonic status conference. If any disputes arise in the meantime, we will raise them with the Court at the conference.

Dated: August 10, 2018

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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was filed with the Clerk of the U.S. District Court for the Northern District of Illinois, Western Division, using the Court's CM/ECF system, and that a copy was served via electronic means on August 10, 2018, upon all counsel of record pursuant to the Northern District of Illinois General Order on Electronic Case Filing.

By: /s/ Daniel Meyer